

Sanders, Peggy J

From: Wright, Mona K
Sent: Monday, May 20, 2013 5:10 PM
To: 'Rob.Whitlam@dahp.wa.gov'
Cc: 'Alyssa Buck, Wanapum'; 'Dana Miller, YN'; 'Darla Jackson, NPT'; 'Jon Meyer, Colville'; 'Josiah Pinkham, NPT'; 'Julie Longenecker, CTUIR'; 'Kristie Babtise'; 'Lynnette Pinkham, NPT'; 'Mike Sobotta, NPT'; 'Rex Buck, Wanapum'; 'Rodriguez, Bambi'; 'Rose Ferri, YN'; HNRTC - Russell, Jim; Rodriguez, Annabelle L
Subject: HCRC#2013-100-016 100 D/H Remaining Site Remediation and Support Activities in the 100 D/H Area of the Hanford Site, Benton County, Washington (HCRC#2013-100-016)

Rob,

This message is in response to the Department of Archaeology and Historic Preservation's (DAHP) April 1, 2013 letter (Log No. 021113-07-DOE) request that the Department of Energy Richland Operations Office (RL) contact the Bonneville Power Administration (BPA) regarding new traditional cultural properties (TCPs) identified during BPA's Midway-Benton transmission line project. The DAHP is concerned about the potential that the new BPA TCPs could be affected by clean up activities in the 100 H Area including the proposed abandonment of a portion of the existing export water line, installation of a new fill station, sampling, remediation of the 100-H-56 and 100-H-38 waste sites to groundwater if necessary and related activities. This proposed project is 7.5 miles north of the Gable Mountain/Gable Butte TCP and the BPA transmission line. The DAHP letter request was sent in response to RL's transmittal of the Cultural Resource Review (HCRC#2013-100-016) to consulting parties which began the project's mandatory 30-day review period (March 27, 2013 through April 29, 2013). Two recorded historic archaeological sites are within the project APE (45BN1107 and 45BN1684) and two new sites (45BN1729 and 45BN1730) were identified during the field survey conducted for this project. Three of these sites (45BN1684, 45BN1729 and 45BN1730) were determined not eligible for listing in the National Register of Historic Places (NRHP). The Hanford Site Plant Railroad (45BN1107) is eligible for listing in the NRHP however none of the components that contribute to National Register significance are located within the APE. RL's March 27, 2013 transmittal letter (13-OCE-0052) to DAHP presented a finding of "no historic properties affected" for DAHP's written concurrence by April 29, 2013.

On March 26, 2013, BPA sent an email message to DAHP and RL stating the consulting party (and not BPA) is itself responsible for responding to RL about concerns they may have about the potential of RL's projects to cause an effect on the new BPA TCP properties. RL previously provided the area of potential effect notification and the cultural resource report documenting the historic property identification efforts to all consulting parties during the section 106 review process. A Confederated Tribes of the Umatilla Indian Reservation (CTUIR) representative sent comments to RL on February 20, 2013 asking why the abandoned water line would not be removed, what contaminants would be expected in the project area, noted 100-H is a culturally sensitive area with places of significance or unrecorded traditional cultural properties that could be affected by project activities, asked about what areas were previously disturbed, past land use, and monitoring in previously undisturbed areas. On February 22, 2013, a Yakama Nation Environmental Restoration/Waste Management (YN ER/WM) representative inquired about RL's actions to identify TCPs as TCP information is limited, consultation may be necessary and requested a copy of a TCP study if such a study had been conducted in the project area. No other comments were received from any other consulting parties during the review period. The comments received from the CTUIR and YN ER/WM representatives during the APE and 30 day review period were addressed. *None of the comments received included any concerns about potential impacts to the new BPA TCPs or the NRHP eligible Hanford Site Plant Railroad.* RL has completed the section 106 process for this proposed project and will notify the project staff of this completion. Remediation activities will begin upon notification and will be conducted as outlined in the cultural resource report.

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